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May 13, 2022

**VIA ECF**

Hon. Philip M. Halpern  
United States District Judge  
Southern District of New York  
300 Quarropas Street, Room 530  
White Plains, New York 10601

**Re: Samuel Felberbaum v. Portfolio Recovery Associates, LLC**  
**No. 7:21-cv-11181-PMH**  
**Letter Motion for Entry of Proposed Form Confidentiality Order**

Your Honor:

This firm represents Defendant Portfolio Recovery Associates, LLC ("PRA") in the above-referenced matter. Pursuant to this Court's April 5, 2022 Civil Case Discovery Plan and Scheduling Order and Your Honor's Individual Rules and Practices, the Parties respectfully request the entry of the attached Proposed Form Confidentiality Order. The attached Proposed Order is the Court's form protective order, endorsed by counsel for both parties, and submitted without substantive alternation.

We thank Your Honor for your time and attention to this matter. If you have any questions or concerns regarding this Letter Motion, please do not hesitate to contact my office.

Respectfully submitted,

/s/ Stephen J. Steinlight  
Stephen J. Steinlight

*Counsel for Defendant*  
*Portfolio Recovery Associates, LLC*